

TITLE 326 AIR POLLUTION CONTROL BOARD

LSA Document #98-163

SUMMARY/RESPONSE TO COMMENTS FROM THE THIRD COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from August 1, 1998, through August 21, 1998, on IDEM's draft rule language. IDEM received comments from the following parties:

Northern Indiana Public Service Company	(NIPSCo)
United States Environmental Protection Agency	(U.S. EPA)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: The operating scenario at draft 326 IAC 6-1-10.1(d)(33)(A)(ii)(AA) restricts boiler numbers 4 and 5 to natural gas usage, and remains silent about fuel usage for boiler numbers 6 and 11. No emission limits are specified for any of the boilers. Emission limits for all four boilers need to be specified under this operating scenario. (U.S. EPA)

Response: The operating scenario of boiler numbers 4 and 5 operating on natural gas at draft 326 IAC 6-1-10.1(d)(33)(A)(ii)(AA) and 326 IAC 7-4-1.1(c)(17)(B)(ii)(AA) has been deleted. The ability to operate boiler number 4 or 5 on natural gas with respective emission limitations is adequately provided for in other proposed operating scenarios in this rulemaking.

Comment: The provisions for biennial stack testing at draft 326 IAC 6-1-10.1(d)(33)(B) are very lengthy and confusing. The provisions could be greatly simplified. Suggested draft rule language was provided. (U.S. EPA)

Comment: The biennial stack testing provisions in subitems (AA) and (BB) under items (i) through (iv) should be combined. Since each of the subitems contain the same limit for each unit, this change will both shorten the rule and clarify that the emission testing procedures found in 326 IAC 3-6 can be applied by IDEM's compliance section. (NIPSCo)

Response: IDEM agrees. The draft language has been clarified.

Comment: This emissions trade will require air quality modeling for U.S. EPA approval. Such modeling should take into account the current National Ambient Air Quality Standards (NAAQS) for particulate matter (PM). The U.S. EPA requests the opportunity to provide input on the modeling before submittal of the SIP revision. (U.S. EPA)

Response: IDEM has reviewed and performed modeling to demonstrate compliance with the particulate and sulfur dioxide standards. IDEM is working with the source and U.S. EPA officials to provide demonstration that air quality will be protected. The modeling demonstrates that PM₁₀ air quality standards will not be exceeded. IDEM is working with the source to provide an

analysis of the modeling data to demonstrate that the PM_{2.5} air quality standard will not be exceeded as well. Based on the assumption that all of the PM₁₀ emitted is PM_{2.5}, the modeling demonstrates compliance with the PM_{2.5} air quality standard. IDEM is working with the source to provide demonstration of compliance in light of the new standard, and is also evaluating the effect of secondary pollutants. This modeling information will be sent to U.S. EPA for review as soon as it becomes available.

Comment: The allowed mass emission rate at draft 326 IAC 6-1-10.1(d)(33)(A)(ii)(BB)(aa) for the described operating scenario is 128.75 pounds per hour. The accompanying text should be corrected to read “one hundred twenty-eight and seventy-five one hundredths” pounds per hour. (NIPSCO)

Response: IDEM agrees. The correction has been made.

Comment: Draft 326 IAC 6-1-10.1(d)(33)(B)(i) requires that NIPSCO Mitchell station conduct stack tests on all four units within sixty day of initial utilization of the operating scenario in clause (A)(ii)(CC). NIPSCO believes that it would be very difficult to coordinate and perform stack tests on all four units within a sixty (60) day period. NIPSCO requests that ninety (90) days be allowed to test all of the units to allow for adequate time to perform all tests. (NIPSCO)

Response: The stack test requirement in the draft rule language at 326 IAC 6-1-10.1(d)(33)(B)(i) has been changed to allow for the additional time that may be needed to coordinate the stack testing of the four boilers. The draft provision requires that stack testing of the four boilers begin within sixty (60) days of the utilization of the operating scenario described at clause (A)(ii)(CC) and be completed within ninety (90) days.

Comment: The proposed rule at 326 IAC 7-4-1.1(c)(17) contains duplicates of clauses (D) and (E). The second set of clauses (D) and (E) should be deleted since they do not include the modifications and corrections previously made. (NIPSCO)

Response: IDEM agrees. The duplicative clauses in the draft rule have been removed.